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REQUIREMENTS

- A. The Quality Control Unit of FIA reviews a sample of TCA cases for payment accuracy by:
1. Analyzing case records and system data
 2. Verifying all eligibility factors in the month of review for the sampled cases based on State policy and approved local plans
 3. Interviewing the customer
 4. Making collateral contacts
 5. Providing the results of the review to the local department with Form **TCA16** which includes:
 - Case payment findings:
 - a. Eligible and correctly paid
 - b. Eligible and overpaid
 - c. Eligible and underpaid
 - d. Ineligible
 - Information about payment errors, when a case is not correctly paid:
 - a. Amount of the payment error
 - b. Eligibility and financial factor inaccuracies that resulted in the error
 - c. Whether the error is caused by the agency or customer
 - Additional information which may affect future or past case eligibility
- B. The Bureau of Continuous Improvement follows up on the case reviews by:
1. Analyzing Quality Control review findings
 2. Ensuring that sampled cases are corrected when required
 2. Approving local department payment accuracy improvement plans
 3. Monitoring implementation of the improvement plans

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- C. The local department:
1. Informs all customers about Quality Control (QC) case reviews and their responsibility to cooperate
 - Advises customers that failure to cooperate results in termination of benefits for the entire family
 2. Makes case records available upon request
 - If the original record cannot be located, compiles a duplicate record
 3. Sanctions families not cooperating with the review process, when notified by QC
 4. Corrects incorrectly paid cases
 - Processes overpayments
 - Issues benefits for underpaid cases if error was caused by the agency
 - Changes ongoing benefits for active cases when appropriate
 5. Develops payment accuracy improvement plans based on QC error profiles, if needed
 6. Implements the improvement plan
- D. The local department can challenge QC findings and present additional information to support their position
- QC considers the additional information and will change the original findings if warranted by the new evidence.
- E. A customer receiving TCA must cooperate with the QC review as a condition of continuing eligibility

NON-COOPERATION

- A. When the QC analyst determines that the customer is not cooperating, the analyst notifies the local department using **Form TCA 35** which:
1. Indicates the specific non-cooperative actions or inactions
 2. Requests that the case manager contact the family to gain cooperation
 3. Advises that a sanction must be imposed if cooperation is not obtained

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- B. The case manager determines if there is good cause for not cooperating because of circumstances beyond the customer's control, such as:
1. Mail going to the wrong address
 2. The family was away from home, both during the period the notices were sent and the scheduled appointment
 3. A family illness or crisis required the customer's full attention
- C. When the customer does not have good cause, but now agrees to cooperate, the case manager:
1. Notifies QC
 2. Tells the customer whom to contact in QC
 3. Evaluates past experience with the individual to determine whether to begin the adverse action and closing process pending full cooperation
 - If the customer has been cooperative and responsible in the past, the case manager may give that person another opportunity to cooperate, without initiating adverse action
 - If the customer has not been cooperative in the past, the case manager may initiate the adverse action and case closing until full cooperation is achieved
- D. If the customer refuses or fails to cooperate with the QC review, the case manager:
1. Does not initiate a conciliation period
 2. Gives timely and adequate notice
 3. Closes the case using AU Status Code 556
 4. Counts the TCA grant as phantom income for Food Stamps
- E. The case is reopened when the customer:
1. Cooperates in completing the QC review and
 2. Reapplies for TCA, and
 3. Meets all other eligibility criteria, or
 4. Reapplies and is found eligible 105 days after the end of the sample year
 - Sample years run from October through the following September

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Note: QC notifies the local department, using **Form 35A**, when the customer cooperates, the review is completed without customer cooperation, or the review cannot be completed.

Note: The TCA grant is counted as phantom income until the customer cooperates with the TCA QC review. If the customer cooperates, the phantom income is removed for the following month.

If the customer does not cooperate, the phantom income continues to be counted until 105 days after the end of the TCA QC sample year. The phantom income is removed for the certification period that begins 105 days or more after the end of the sample year.

- F. Authorize benefits after the individual has fully cooperated with the QC review, as follows:
1. In the first non-pay month, pay full benefits for that month
 2. After the first non-pay month:
 - Pro-rate the benefit from the date of application
 - Do not pay benefits for any month prior to the month the customer fully cooperates
- G. If the customer is willing to cooperate in the first non-pay month, but is not able to fully cooperate until a subsequent month through no fault of his or her own:
1. Pay full benefits for the month in which full cooperation was achieved
 2. Do not authorize benefits until the customer fully cooperates
- H. The QC analyst and/or supervisor must notify the local department as soon as the customer cooperates

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EXAMPLES

Example 1. Ms. Apple receives TCA for herself and 2 children. She is sent an appointment letter for the QC review. Ms. Apple is not at home for the appointment and does not respond to any subsequent attempts so the local department is notified. The case manager tries to contact Ms. Apple, but she does not respond. A Notice of Adverse Action (NOAA) is issued and the case closes March 1. Ms. Apple reapplies on March 27, agrees to cooperate, and meets with the analyst on April 3.

- Do not authorize benefits for March because full cooperation is not achieved until April
- Issue full benefits for April, on or after April 3, because she began cooperating in March, but was not able to fully meet the requirement until April
- The TCA grant continued to be counted as phantom income for Food Stamps when TCA closed. Remove the phantom income when the TCA benefits begin.

Example 2. Mrs. Peach receives assistance for herself and her 3 children. She does not keep her appointment with the QC analyst and does not respond to additional attempts to reschedule. The case manager contacts Mrs. Peach on July 17. She lacks good cause, but now is willing to cooperate. The QC analyst schedules an appointment for July 22, which Mrs. Peach does not keep. The case manager is notified and sends the NOAA. Mrs. Peach calls on July 24 and says her mother was sick so she missed the appointment.

- Keep the NOAA in effect
- If Mrs. Peach can reschedule and keep an appointment before July 31, rescind the closing
- If Mrs. Peach cannot get an appointment until August, let the case close, but re-open after she cooperates and give a full benefit for August

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Example 3. The local department receives the **TCA16** on July 25, which states that Mr. Purple was overpaid \$100 in the review month of May because he began receiving Veteran's Benefits on March 23. The error was attributed to the customer, but the analyst does not suspect fraud. The local department agrees with the findings and confirms that the benefits will be ongoing.

- Send a NOAA to reduce the benefit for September
- Calculate an overpayment for May (first month that the change could have been in effect), June, July, and August

Example 4. Mrs. Orange receives assistance for her nephews. She refuses to cooperate with the QC review and cannot be persuaded by the case manager to do so.

- Close the case after giving timely and adequate notice
- If the family receives Food Stamps, the TCA grant is countable as phantom income

Example 5. Miss Plum receives assistance for herself and her daughter. She has not responded to QC and the case manager is notified. Miss Plum tells the case manager on February 14 that she just forgot, but is now willing to cooperate. Miss Plum is told that she must contact QC to schedule an appointment and that she will receive a NOAA pending notification that she has met with the QC analyst. Miss Plum does not follow through and the case is closed effective March. She reapplies in July.

- Pend Miss Plum's case, but do not open it until QC notifies the case manager that she has cooperated
- Treat this like any other application, and prorate the benefit
- If Miss Plum does not cooperate with QC within 30 days, deny the case
- The TCA grant amount has been countable as phantom income for Food Stamps since TCA closed effective March. The phantom income is removed if the TCA case is opened.

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Example 6. The local department receives the **TCA16** on March 17 stating that Ms. Brown was overpaid \$300 in January. The case record confirms that Ms. Brown was employed and earnings were entered into CARES. QC could not find any verification of the earnings in the record and could not replicate the gross earnings in CARES. Since QC could not replicate the income used by the local department, the analyst recalculated and found an overpayment based on different gross earnings.

- The local department found the verifications that supported the case manager's income calculations and challenged the findings
- In this case, QC changes the case findings after agreeing that the local department used a reasonable earnings estimate and the case was correctly paid

ADDITIONAL INFORMATION

- Adverse Action – Adverse/ Timely Notice
- Application – Interview/ Role of Case Manager
- Payment Irregularities – Payment Irregularities